

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FARAH JEAN FRANCOIS,

Case No.: 1:22-cv-4447-JSR

Plaintiff,

-against-

**SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI,
STAVROS ORSARIS,
YESSICA VALLEJO, and
DAVID PEREZ**

Defendants.
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DECLARATION OF EMMA CATERINE

I, Emma Caterine, declare under penalty of perjury, as provided or by the laws of the United States, 28 U.S.C. § 1746, that the following statements are true:

1. My name is Emma Caterine. I am of sound mind and capable of giving this declaration.
2. The facts stated in this declaration are within my personal knowledge and are true and correct.
3. Attached are the contemporaneously kept billing records reflecting The Law Office of Ahmad Keshavarz's services and billing in this litigation through the date of the invoice. Those documents are incorporated by reference. They are a true and accurate representation of my work on this case, and if called to testify I would state the same.
4. I am a member in good standing of the bar of New York (admitted March 27, 2019) and have a Rule 705 Motion pending for admission to the bar of Illinois.
5. I am also admitted to the bar of the United States District Courts for the Eastern and Southern Districts of New York and the Northern District of Illinois, and in good standing with

all these courts.

6. From September 1, 2018 to July 26, 2024, I was employed by The Law Office of Ahmad Keshavarz as an attorney.

7. I am currently employed by Jacobs, Burns, Orlove & Hernandez, LLP in Chicago, Illinois, and have been since August 1, 2024.

8. I graduated from the College of William & Mary with two Bachelor of Arts, in English and Africana Studies, in May 2012, and received the Middleton Award for Academic Excellence.

9. I received my Juris Doctorate from City University of New York Law School in May of 2018.

10. I served in the Pathway Internship program in the Consumer Financial Protection Bureau's Office of Enforcement from June 2017 to August 2017.

11. In addition to consumer rights litigation, I have experience in the fields of employee benefits, employment discrimination, labor relations, and criminal law.

12. During my time employed by The Law Office of Ahmad Keshavarz, my focus was on representation of consumers in consumer rights litigation, predominantly the Fair Debt Collection Practices Act (FDCPA) and Fair Credit Reporting Act (FCRA).

13. I am a member of the National Association of Consumer Advocates and the AFL-CIO Union Lawyers Alliance.

14. I have served on the boards of the National Lawyers Guild and Modern Money Network, served on the New York City Bar Association's Civil Court Committee in 2017, and served on the FDCPA Committee for the National Association for Consumer Advocates Spring Training in

2023.

15. My publications on or related to consumer rights law include:

- i. *Breadth and Taxes*, The Law and Political Economy Project (Sept. 8, 2020);
- ii. *The Market Does Not Bind Us*, The Law and Political Economy Project (Oct. 2, 2019); and
- iii. *A Fresh Start For A Women's Economy: Beyond Punitive Consumer Bankruptcy*, Berkeley Journal of Gender, Law & Justice, Vol. 33 (2018).

16. I have presented on consumer rights law at the NCLC Consumer Rights Litigation Conference in 2022 and 2023, the National Association for Consumer Advocates Spring Training in 2023, and at the CFPB Field Hearing on Nursing Home Debt Collection Practices.

17. I began working at The Law Office of Ahmad Keshavarz in August,

18. In the Law Office of Ahmad Keshavarz, I appeared in 45 lawsuits in the Southern and Eastern Districts of New York.

19. Many favorable decisions from these cases have been published on Westlaw, including the following :

- i. *Francois v. Victory Auto Grp. LLC*, No. 22-CV-04447 (JSR), 2024 WL 396171, (S.D.N.Y. Feb. 2, 2024)
- ii. *Francois v. Victory Auto Grp., LLC*, 2023 WL 373250 (S.D.N.Y. Jan. 24, 2023);
- iii. *Francois v. Victory Auto Grp., LLC*, 2023 WL 4534375 (S.D.N.Y. July 13, 2023);
- iv. *Onfroy v. L. Offs. of Geoffrey T. Mott, P.C.*, No. 22-CV-02314(EK)(LB), 2024 WL 4350489, (E.D.N.Y. Sept. 30, 2024)
- v. *Texidor v. Tromberg, Morris, & Poulin, PLLC*, No. 21-CV-4845 (RPK)(LB), 2023 WL 8043067, (E.D.N.Y. Nov. 20, 2023)
- vi. *Grant v. Geller*, 2023 WL 2697739 (E.D.N.Y. Mar. 29, 2023);
- vii. *Villalba v. Houslanger & Assocs., PLLC*, No. 19-CV-4270PKCRLM, 2022 WL

- 900538, (E.D.N.Y. Mar. 28, 2022).
- viii. *Fritz v. LVNV Funding, LLC*, 587 F. Supp. 3d 1, (E.D.N.Y. 2022).
 - ix. *Ghabra v. Palisades Collection, L.L.C.*, 2022 WL 17489969 (E.D.N.Y. Dec. 7, 2022);
 - x. *Villalba v. Houslanger & Assocs., PLLC*, 2022 WL 900538 (E.D.N.Y. Mar. 28, 2022);
 - xi. *Grant v. Geller*, No. 20-CV-4406HGCLP, 2023 WL 2697739, (E.D.N.Y. Mar. 29, 2023)
 - xii. *Fritz v. LVNV Funding, LLC*, 2022 WL 610585 (E.D.N.Y. Feb. 28, 2022);
 - xiii. *Galeas v. Houslanger & Assocs, PLLC*, No. 19-CV-4270 (PKC), 2021 WL 2843214, (E.D.N.Y. June 21, 2021)
 - xiv. *Rivera v. Fin. Asset Mgmt. Sys., Inc.*, 2020 WL 5791175 (E.D.N.Y. Sept. 25, 2020).
 - xv. *Oglesby v. Alltran Fin. LP*, No. 19-CV-1834AMDCLP, 2020 WL 281338, (E.D.N.Y. Jan. 17, 2020).
 - xvi. *Hunter v. Palisades Acquisition XVI, LLC*, No. 16 CIV. 8779 (ER), 2019 WL 310772, (S.D.N.Y. Jan. 23, 2019).

20. I have also frequently lobbied, both in coalition actions (such as Consumer Lobby Day at Congress) and individually, in Congress, the New York state legislature, and New York City Council concerning consumer-protection issues.

21. I have been interviewed and published by many media organizations regarding consumer rights issues, including but not limited to Barron's, MarketWatch, and the New York Law Journal.

22. Prior to my departure from The Law Office of Ahmad Keshavarz, I represented Plaintiff as an attorney at The Law Office of Ahmad Keshavarz in this case on a contingency basis.

23. My work on this case precluded me from accepting other employment and from billing time on other existing cases.

24. Both from my time working at The Law Office of Ahmad Keshavarz as well as my time

as a legal intern at nonprofits like New Economy Project and New York Legal Assistance Group, which have co-counseled with Mr. Keshavarz on a number of cases, I know Mr. Keshavarz and am familiar with his work as an attorney. He is a highly skilled, incredibly zealous, and successful attorney based in Brooklyn, New York. He appeared as counsel in all 45 lawsuits wherein I appeared, and both his own work as well his guidance and supervision of my work was integral to the resolutions and successes of those actions.

25. From my time regularly litigating in the Southern District of New York while employed at The Law Office of Ahmad Keshavarz, I am familiar with the billing rates and practices of attorneys handling complex federal cases in the Southern District of New York.

26. I am very familiar with Mr. Keshavarz's work as a consumer attorney. Based upon my education, training and experience, it is my opinion that a reasonable hourly rate for Mr. Keshavarz's time in this case is \$550. Further, these fees are customary in the Southern District of New York for an attorney with his level of experience, reputation and ability, considering the nature of the controversy, the time limitations imposed, and the results obtained.

27. As to myself, upon my education, training and experience, it is my opinion that a reasonable hourly rate in this case is \$350. This hourly rate is reasonable and customary in the Southern District of New York for attorneys with my level of experience, reputation, and ability, considering the nature of the controversy, the time limitations imposed, and the results obtained.

Dated: Chicago, Illinois
December 23, 2024

/s/

Emma Catherine